## **UNITED STATES DISTRICT COURT**

## **SOUTHERN DISTRICT OF GEORGIA**

		DIVISION
	Plaintiff	) ) ) Case No. )
	Defendant	
Part		rticipated in conference:
	endant and state whe	o be served, please identify the n service is expected.
Dat	e the Rule 26(a)(1) disc	closures were made or will be made
Rule thos	e 26(a)(1) or proposes of	king the initial disclosures required bechanges to the timing or form of
(a)	se disclosures, Identify the party or p proposal:	parties making the objection or
(u)	Identify the party or p	parties making the objection or

	Local Rules provide a 140-day period for discovery. If any ry is requesting additional time for discovery,
(a)	Identify the party or parties requesting additional time:
(b)	State the number of months the parties are requesting for discovery:
	months
(c)	Identify the reason(s) for requesting additional time for discovery:
	Unusually large number of parties
	Unusually large number of claims or defenses
	Unusually large number of witnesses
	Exceptionally complex factual issues
	Need for discovery outside the United States
(d)	Other: Please provide a brief statement in support of each of the reasons identified above:

	ny party is requesting that disco es or conducted in phases, plec				
(a)	Identify the party or parties re	questing such limits:			
(b)	State the nature of any proposed limits:				
	Local Rules provide, and the Cowing deadlines:	ourt generally imposes, the			
Last ed	day for filing motions to add or join parties or amend plead	•			
	day to furnish expert witness ort by plaintiff	60 days after Rule26(f) conference			
Last day to furnish expert witness report by a defendant		90 days after Rule 26(f) conference (c 60 days after the answer, whichever is later)			

9.

30 days after close of

	discovery
If an	y party requests a modification of any of these deadlines,
(a)	Identify the party or parties requesting the modification:
(b)	State which deadline should be modified and the reason supporting the request:
If the	e case involves electronic discovery,
(a)	State whether the parties have reached an agreement regarding the preservation, disclosure, or discovery of electronically stored information, and if the parties prefer to have their agreement memoralized in the scheduling order, briefly describe the terms of their agreement:
(b)	Identify any issues regarding electronically stored information as to which the parties have been unable to reach an agreement:

	he case is known to involve claims of privilege or protection trial preparation material,
(a)	State whether the parties have reached an agreement regarding the procedures for asserting claims of privilegor protection after production of either electronic or oth discovery material:
(b)	Briefly describe the terms of any agreement the parties wish to have memoralized in the scheduling order (or attach any separate proposed order which the parties are requesting the Court to enter addressing such matters):
(c)	Identify any issues regarding claims of privilege or protection as to which the parties have been unable to reach an agreement:
Sto	ate any other matters the Court should include in its neduling order:

hindranc		, .	ific prob	olems		ution of the ve created
This			, ,, ,	20 .		
	0.9.10					for Plaintiff
	nindranc	This day of	nindrance to the settlement	This day of, 2	This, 20 .	This, 20 . Signed: